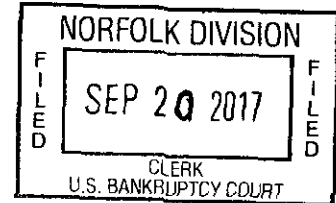


Mr. Thomas B. Dickenson
Dickenson & Dickenson
1170 Lexan Ave. Ste. 203
Norfolk, VA 23508



September 16, 2017

Re: Chapter 13 case – 13-50154-SCS

Enclosure (1): Dickenson and Dickenson Letter dated September 1, 2017
Reference: Response to Motion for Sanctions dated September 1, 2017

Dear Sir,

We are in receipt of your letter dated September 1, 2017.

Where we disagree with the descriptions provided by Ms. Lawrence regarding the frequency and content of communication that took place between Ms. Lawrence and ourselves, we do not intend to pursue this matter any further as Ms. Lawrence has agreed the responsibility for the issues at hand fall squarely upon her shoulders as counsel. We do not intend to appear before the Court on the scheduled date of October 11, 2017, trusting the Court to determine the appropriate sanctions.

We dispute the notion that no financial harm has taken place. We currently find ourselves in the position of having to provide \$2,521.00 to the Trustee on the first of each month through the end of the year. This monthly amount represents a burden. We acknowledge the debt to the bank and are paying it faithfully; however, had our inquiries regarding payment stoppage been addressed promptly, this burden could have been spread over time.

Thank You,

John P. Erwin

Deborah M. Erwin

Deborah M. Erwin
Copy:

The Honorable Stephen C. St. John
US Bankruptcy Court
600 Granby St. Norfolk, VA 23510-1915

John P. Erwin
Deborah M. Erwin
111 Oak Ridge Court
Williamsburg, VA 23188

Mr. Michael P. Cotter (Trustee)
870 Greenbrier Circle, Ste. 402
Chesapeake, VA 23320

Ms. Rebecca C. Lawrence
Krinick, Segall & Lawrence
11848 Rock Landing Drive, Ste. 103
Newport News, VA 23606



Dickenson & Dickenson, Attorneys-at-Law

September 1, 2017

John P. Erwin
Deborah M. Erwin
111 Oak Ridge Ct.
Williamsburg, VA 2318

Re: Chapter 13 case – 13-50154-SCS

Dear Mr. and Mrs. Erwin,

As you are aware, your case trustee has asked the Bankruptcy Court to consider sanctions against your attorney, Ms. Lawrence, for having filed a modified plan in your case before obtaining your signatures. (I understand that you later signed that plan as well as a further modified plan.)

Enclosed is a copy of the response I have filed on Ms. Lawrence's behalf as her counsel.

Please be assured that at no point has anyone tried to say that you did anything wrong in your case. I understand that the most recent modified plan was confirmed by the Court yesterday and that your case is moving forward nicely toward a successful completion including a Chapter 13 discharge.

There will be a hearing before Chief Judge St. John on October 11, 2017 at 9:30 a.m. at his Bankruptcy courtroom in Norfolk regarding the sanctions motion. You are entitled to appear if you choose.

We are hopeful that you are ultimately satisfied with the services Ms. Lawrence has rendered to you since substituting into your case. Please let me know if you feel otherwise so we may be sure your case's needs are met.

Sincerely,

Thomas B. Dickenson

NORFOLK OFFICE:
1170 LEXAN AVENUE, SUITE 203
NORFOLK, VA 23508
TELEPHONE: 757-489-1300 FAX: 757-489-1400

SUFFOLK OFFICE:
150 W. WASHINGTON STREET, SUITE H
SUFFOLK, VA 23434
TELEPHONE: 757-754-4810 FAX 757-489-1400

DANIEL D. DICKENSON, III, ESQ.
DAN@DICKENSONLAW.COM

THOMAS B. DICKENSON, ESQ.
TOM@DICKENSONLAW.COM